



December 23, 2014

Chairman Tom Wheeler, Commissioner Mignon Clyburn,
Commissioner Jessica Rosenworcel, Commissioner Ajit Pai,
Commissioner Michael O'Rielly, c/o Marlene H. Dortch, Secretary,
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

I'm writing on behalf of Kentucky Shakespeare Festival, Inc., the oldest free Shakespeare festival in the United State, located in Louisville, KY. We provide over 60 performances a year to 30,000 audience members and education programs to 50,000 students. Grounded in the works of Shakespeare, Kentucky Shakespeare's mission is to enrich the community by presenting accessible, professional theatre experiences that educate, inspire and entertain people of all ages. Kentucky Shakespeare, designated as the Official Shakespeare Company of the Commonwealth of Kentucky, is a non-profit, professional theatre company founded in 1949 and incorporated in 1963.

In 2014 for the first time in our history, we successful integrated a wireless microphone system into our 1,000 seat amphitheater. Audience members, included the hearing impaired, can now hear like never before. I am writing with concern about protection for our wireless microphones and backstage communications devices.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. We use less than 50 devices. This would leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market, and we are located next to the Louisville International Airport. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

MATT WALLACE, PRODUCING ARTISTIC DIRECTOR

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KENTUCKY SHAKESPEARE

- SINCE 1949 -

We own several wireless hand-held microphones and 16 wireless body microphones for actors and a Yamaha QL5 digital sound board.

We also use several wireless communication radios with earpieces. We use approximately 20 total wireless units during a performance. We use them at least 3 hours per night for our entire 10-week summer season.

We work at both high and low uhf because we have so many microphones, we diversify the frequencies to cause little interference.

We can tune the microphones to one frequency at a time each but we have a choice of 1680 different frequencies. Our microphones can be tuned to different frequencies.

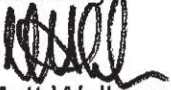
All of our wireless devices are digital, and the life expectancy for our equipment is 5-10 years.

We propose that the FCC provide reimbursement of the expense as well as that the quality of the new devices would have to satisfy performance standards.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,



Matt Wallace
Producing Artistic Director
Kentucky Shakespeare